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VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007
(212) 805-6165

Re: *Great Western Ins. Co. v. Mark Graham et. al.*,
Case No. 1:18-cv-06249 (VSB)

Dear Judge Broderick:

We are counsel to Ability Insurance Company, Advantage Capital Holding LLC, Dan Cathcart, and Kenneth King (the “Ability Defendants”) in the above-captioned matter.

Per Rule 4.J. of Your Honor’s Individual Rules & Practices in Civil Cases, the Ability Defendants respectfully request oral argument in connection with their Motion to Dismiss the Specific Claims Pleaded Against Ability Insurance Company, Advantage Capital Holding LLC, Dan Cathcart, and Kenneth King in Great Western Insurance Company’s Second Amended Complaint, dated December 19, 2018, (Dkt. 106). We appreciate Your Honor’s attention to these matters.

Respectfully submitted,

/s/ Hal S. Shaftel
Hal S. Shaftel

cc: All Counsel of Record

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